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Attorneys for Plaintiff Gor Gevorkyan

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Gor Gevorkyan on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

Bitmain, Inc., Bitmain Technologies, Ltd.  
and DOES 1 to 10,

Defendants.

**THE MARLBOROUGH LAW FIRM, P.C.**

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Case Number: 3:18-cv-07004-JD

**DECLARATION OF CHRISTOPHER  
MARLBOROUGH IN SUPPORT OF  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL RE:  
SUPPLEMENTAL MEMORANDUM OF  
LAW IN OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS**

**DECLARATION OF CHRISTOPHER MARLBOROUGH**

I, CHRISTOPHER MARLBOROUGH, declare as follows:

1. I am a citizen of New York, New York at all times relevant. I am acting counsel for the named Plaintiff, Gor Gevorkyan ("Plaintiff"). I make this declaration in support of Plaintiff's Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss. If called as a witness, I could and would testify competently to the following facts, all of which are within my own personal knowledge.

2. Attached hereto as Exhibit A are true and correct copies of documents in Exhibit 2 to the Declaration of Karo Karapetyan in Support of Plaintiff's Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss ("Karapetyan Declaration"), for which Plaintiff seeks an order to seal in their entirety because Defendant Bitmain Technologies, Ltd. ("Bitmain HK") has designated these documents as "CONFIDENTIAL."

3. Attached hereto as Exhibit B are true and correct copies of documents in Exhibit 3 to the Karapetyan Declaration, for which Plaintiff seeks an order to seal in their entirety because Bitmain HK has designated these documents as "CONFIDENTIAL."

4. Attached hereto as Exhibit C are true and correct copies of documents in Exhibit 9 to the Karapetyan Declaration, for which Plaintiff seeks an order to seal in their entirety because Bitmain HK has designated these documents as "CONFIDENTIAL."

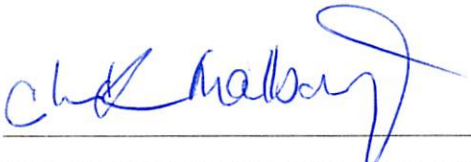
5. Attached hereto as Exhibit D are true and correct copies of documents in Exhibit 10 to the Karapetyan Declaration, for which Plaintiff seeks an order to seal in their entirety because Bitmain HK has designated these documents as "CONFIDENTIAL."

6. Attached hereto as Exhibit E are true and correct copies of documents in Exhibit 13 to the Karapetyan Declaration, for which Plaintiff seeks an order to seal in their entirety because Bitmain HK has designated these documents as "CONFIDENTIAL."

7. Attached hereto as Exhibit F are true and correct copies of documents in Exhibit 16 to the Karapetyan Declaration, for which Plaintiff seeks an order to seal in their entirety because Bitmain HK has designated these documents as "CONFIDENTIAL."

1           8.       Plaintiff takes no position on whether the documents in the exhibits hereto satisfy  
2 the requirements for sealing. Plaintiff specifically reserves the right to challenge any  
3 “CONFIDENTIAL” designation by Bitmain HK under the Stipulated Protective Order in this  
4 case (Dkt. 54), as well as the sealability of these documents under Civil Local Rule 79-5.

5           I declare under penalty of perjury under the laws of the United States and the States of  
6 California and New York, that the foregoing is true and correct and that this Declaration was  
7 executed on this 11<sup>th</sup> day of June 2020, in Lynbrook, NY.

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9 \_\_\_\_\_  
10 **CHRISTOPHER MARLBOROUGH**